

Specifically, the proposal that would force every radio station to take programming advice from community advisory boards broadly representative of an area's population. Bad idea. That means that Christian broadcast stations could be forced to take programming advice from people whose values are at odds with a religious broadcast facility. A well organized group of atheists, abortionists or secular humanists could demand representation – and have standing to cause trouble at the FCC if they were turned away.

Any Christian Broadcaster who stands up to the pressure and refuses to compromise on matters of conscience, could find his or her station's license renewal tied up for many years as the FCC considers complaints and allegations over nothing more than the station's chosen broadcast message! The First Amendment protects the free exercise of religion. The government must not be allowed to impose rules that violate it.

Among the proposed new regulations are requirements that stations report, every three months, how much programming of various types has been broadcast, who produced it, and how it reflects the interests of a cross-section of local residents – even those who do not share Gospel values.

If enacted, such requirements will give Christian Radio's opponents powerful new tools to harass and possibly silence Gospel inspired voices. Armed with these reports, adversaries can file complaints with the FCC against Christian Broadcasters who refuse to compromise on Gospel principles; any Christian Station that insists on only pure Gospel programming could be made to pay a high price for its refusal to yield airtime to those with other messages. The First Amendment protects the free exercise of religion. The government must not be allowed to impose rules that violate it.

One proposed variation would even force stations to grant a certain amount of airtime to any group that requests it – much like cable television systems make time available on "public access channels." But unlike public access channels, which were created as a kind of open public forum, Christian Radio is a combination of pulpit and mission. The government cannot force messages from any pulpit, nor insist that missionaries promulgate viewpoints contrary to the Gospel. The same way, it should not be forcing Christian Radio stations to deliver the messages promulgated by secular humanists, abortionists or atheists.

The proposal is also considering ways it could increase its coercive powers to force speech on unwilling broadcasters. Even a station that avoided sanctions during a typical eight-year license term could find its license renewal challenged. While this has long been true, in recent years, the delays caused by these challenges were usually more of a nuisance than a disaster, as skilled civil service professionals worked through issues. These government experts had authority to apply reason, and ultimately granted almost every renewal presented. The First Amendment protects the free exercise of religion. The government must not be allowed to impose rules that violate it.

But the proposal with regards to the license renewal processing procedure that would take renewal-granting power out of the hands of qualified civil servants when a Christian station, in good conscience, has kept its message pure and not allowed its facilities to be used to promulgate other messages. Instead of routine processing by civil servants, such a station's renewal application will be subject to the often multi-year process of review by the politically-appointed FCC commissioners. Not only will such a designation make a license renewal more time-consuming, but also more costly to obtain; Christian Broadcasters facing such a process will likely need greater assistance from lawyers and other consultants – added expenses that could prove ruinous. The First Amendment protects the free exercise of religion. The government must not be allowed to impose rules that violate it.

Finally, the proposal would drive up the costs of providing Christian Broadcasting services by eliminating labour-saving technological enhancements that make it possible to operate radio stations, at least part of the time, without an employee on the premises.

Although such un-staffed operations have been the norm for years, the proposed rule would require staffing whenever a radio station is on the air – even if all the programming at that time is delivered by satellite. God's love may be free to all, but getting the word out will become even more expensive – perhaps too expensive for some radio stations.

The proposal that would force many Christian stations to relocate their main studio facilities. Now, it is possible to serve several missions from one location. But under this proposal, many co-location arrangements would be forced to end – raising daily operating costs and imposing immediate expenses related to moving, construction of other facilities and overseeing forced relocations. When coupled with the rapidly rising costs of broadcasting, including multiplying electricity expenses, extended staffing requirements and forced relocations will leave some Christian Broadcasters with little choice: either cut back or give up. The public will be the ones to lose in the end by losing 24 hour programming and or their local radio station altogether due to the fact of higher operating expenses would cause the station to cut back on services or cease broadcasting altogether.

If the proposed rules take effect, people will be more under served by radio in general. Due to the increased cost of operation, stations will shorten their hours of operation or just simply shut down all together. Radio is not like cable TV where it is a free for all for whoever thinks they know what the public wants to hear. Radio is not a place for arm chair program directors or so called community advisory boards. If the FCC wishes to make radio more accessible to the public, loosen the regulations surrounding LPFM and open up more filing windows. Radio and broadcasting in general has operated the way it has currently for over 2 decades without any problems. The broadcast

industry has moved along with technology and the times. Radio and broadcasting is not broke, so do not fix what is not broke. The FCC regulates RF signals and assigns where those signals can and can not be sent from. The FCC was not formed to regulate a broadcast facilities programming content and must not be allowed to do so. Finally on that note.....

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